USDI, Bureau of Land Management
Andrews Resource Area, Burns District

Notice of Proposed Decision
and
Finding of No Significant Impact
for
Pass Creek Riparian Pasture
Environmental Assessment
OR-025-06-072

INTRODUCTION/SUMMARY OF PROPOSED ACTION

The Bureau of Land Management (BLM) is proposing to construct approximately 2 miles of fence along Pass Creek in O'Keefe Seeding Pasture of Fields Basin Allotment in order to create a new riparian pasture. A BLM interdisciplinary team (IDT) recommended action be taken to accelerate growth of riparian vegetation in the Pass Creek riparian area. The goal of the project is to address deficiencies in Standards for Rangeland Health for riparian condition, and by association, water quality, while providing for sustainable livestock grazing that meets allotment management objectives and Standards for Rangeland Health Guidelines for Livestock Management (S&Gs). In addition to the Proposed Action, BLM also analyzed a No Action Alternative, a Herding Alternative, and a Livestock Removal Alternative.

The allotment is located in Andrews Management Unit (AMU) in the southern portion of Harney County, Oregon. Fields Basin Allotment borders on Pueblo Mountains to the south and Basque Hills to the west and Harney County Road No. 202 to the north and east. O'Keefe Seeding Pasture is one of seven pastures in Fields Basin Allotment. Two term permits are currently authorized for 3,325 Animal Unit Months (AUMs) for Fields Basin Allotment as a whole in spring (mid-April to mid-June) and late summer and fall (early August to mid-October) seasons. All authorized livestock grazing is by cattle. Other forage allocations include 49 AUMs for mule deer and seven AUMs for pronghorn. Fields Basin is a Management Category "I" (Improve) allotment. The "Improve" category identifies allotments with management and resource concerns. These allotments receive priority for implementation, effectiveness, and performance monitoring.

Project Goals and Objectives

The goal of the project is to improve the condition of the riparian vegetation community along Pass Creek within O'Keefe Seeding Pasture (Resource Management Plan [RMP] Appendix J-38) in a manner consistent with AMU RMP management direction for Social and Economic Values, Vegetation, and Grazing Management, including:

1. Resource Use - Provide for sustainable livestock grazing that meets allotment management (natural resource) objectives and the S&Gs (Social and Economic Values, RMP p. 45).

2. Resource Enhancement - Maintain, restore, or improve riparian/wetland vegetation communities relative to ecological status, site potential and capability, or site-specific management objectives, and Transportation Plans (Vegetation, RMP p. 24-25).
3. Resource Use - Implement administrative solutions and rangeland projects to provide proper management for livestock grazing while meeting resource objectives and requirements for S&Gs (Grazing Management, RMP p. 54-56).
4. Resource Enhancement - Maintain, restore, or improve [fish and wildlife] habitat. (Fish and Wildlife, RMP p. 33).

Specifically, the objective is to increase diversity and vigor of riparian plant species along Pass Creek such that a clear upward trend toward the potential natural community can be recognized at the conclusion of six growing seasons. At that time, post-season utilization monitoring, photo points and/or a Proper Function Condition (PFC) assessment should be able to recognize the following potential indicators (BLM Technical Reference 1737-15 1998, p. 35-52):

1. An increase in riparian vegetation cover on streambanks, especially, rushes, sedges and willows (Pass Creek has the biological potential for increased cover by willow species);
2. An increase in riparian species diversity (new riparian species have been identified since the previous monitoring occurred);
3. Evidence of recruitment (young plants) of all riparian species, especially rushes, sedges and willows;
4. A relative decrease in upland species such as cheatgrass and thistles that is currently present in the riparian area.

The livestock permittees would be responsible for fence maintenance. The proposed action would include the following Project Design Features:

1. The fence would be constructed to BLM specifications for a 3-strand barbed wire fence, including 22-foot line post spacings. Wire spacings would be 18 inches, 30 inches, and 42 inches from the ground up with a smooth bottom wire.
2. No blading, grading, or scalping of the fenceline would be allowed.
3. Prior to final inspection all trash and excess debris would be removed from public lands and disposed of at a site approved by the BLM Contracting Officer.
4. Fence construction activities would occur after the ground has dried up and before weeds have set seed. Seed set generally occurs from approximately June 1 through July 1.
5. Vehicles and equipment would be cleaned prior to bringing to the site for fence work.
6. The BLM would continue to collect and analyze rangeland and riparian/stream monitoring data and monitor the site for new weed introductions on Pass Creek to determine if, and when, riparian objectives in Fields Basin Allotment have been met.

FINDING OF NO SIGNIFICANT IMPACT

This attached Environmental Assessment (EA) is tiered to the AMU/ Steens Mountain Cooperative Management and Protection Area (CMPA) Proposed RMP and Final Environmental Impact Statement (PRMP/FEIS) and relevant information contained therein is incorporated by reference. The proposed action has been designed to conform to the following documents, which direct and provide the legal framework for management of BLM lands within the Burns District:

- Taylor Grazing Act (43 U.S.C 315 - 1934)
- National Environmental Policy Act (42 U.S.C. 4321-4347)1970
- Federal Land Policy Management Act (43 U.S.C. 1701, 1976)
- Public Rangelands Improvement Act (43 U.S.C. 1901. 1978)
- Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management in the States of Oregon and Washington (1997)
- Greater Sage-Grouse and Sagebrush-Steppe Ecosystems Management Guidelines (interagency - 2000)
- Bureau of Land Management National Sage-Grouse Habitat Conservation Strategy (2004)
- Local Integrated Noxious Weed Control Plan (2004)
- Andrews Management Unit Resource Management Plan/Record of Decision (August 2005)

Based on the analysis of potential environmental impacts contained in the Environmental Assessment (EA) and all other information, I have determined the proposal and alternatives analyzed do not constitute a major Federal action that would significantly impact the quality of the human environment. Therefore, an Environmental Impact Statement is not necessary and will not be prepared.

Rationale:

This determination was based on the following: The following critical elements of the human environment and other potential concerns were considered and determined not to be known to be affected nor impacted by the proposed action or alternatives:

> Areas of Critical Environmental Concerns, Air Quality, American Indian Traditional Practices, Environmental Justice, Farmlands (prime or unique), Flood Plains, Hazardous Materials, Paleontology, Special Status Species – Flora, Water Quality (drinking or ground water), Recreation, Wild and Scenic Rivers, and Wilderness and Wilderness Study Areas.

All potential impacted resources were analyzed in the EA specific to the proposed action. The following resources were analyzed in the EA:

> Cultural Heritage, Migratory Birds, Noxious Weeds, Special Status Species – Flora, Water Quality, Wetlands/Riparian Areas, Grazing Management, Soils, Vegetation, Visual Resources, and Wildlife.

Impacts to these resources are all considered to be nonsignificant (based on the definition of significance in 40 CFR 1508.27) for the following reasons:

Wetlands and Riparian Zones

The Proposed Action would physically separate Pass Creek riparian area from the majority of uplands in O'Keefe Seeding Pasture and reduce effects of grazing from approximately 950 AUMs in alternate spring and late summer/fall seasons to maximum spring use of 125 AUMs and maximum late summer/fall use of 50 AUMs. This would facilitate management for riparian function objectives in the riparian area, and allow for better utilization of uplands. No late summer/fall livestock grazing would occur for three full growing seasons (until 2010, after the fire recovery period plus one spring-use only year). The IDT expects enhanced recovery of riparian vegetation would occur.

Based on experience with changes in grazing management elsewhere in Andrews Resource Area, after spring grazing is resumed with reduced livestock numbers, residual stubble height of key riparian sedges and rushes at close of the grazing season would be greater than under previous stocking levels. Since additional resources would be available for the next season's growth, these key species would likely expand and increase in vigor more rapidly than before. This would improve bank stabilization and overall physical integrity of the riparian area, especially where willows expand and become established in entrenched reaches of the stream. Monitoring at the mid-point of the later grazing season and removal of livestock as necessary are expected to reduce or eliminate potential suppression of recruitment and vigor of woody species resulting from late summer/fall grazing.

Although pace of recruitment of willows or other woody vegetation and increase in vigor of sedges and rushes is not predictable, the IDT expects a clear qualitative upward trend in riparian functioning condition would be recognized by monitoring efforts after six growing seasons. The Proposed Action would not contribute to cumulative effects to the PFC of riparian habitats within Alvord Basin because these effects would be local in scope by nature and limited to Pass Creek within the new riparian pasture.

Noxious Weeds

Enhancement and accelerated growth of riparian vegetation would increase competition for plant resources, and is likely to reduce extent and vigor of the thistle infestation within the riparian area. This may reduce the need for herbicide treatments as vigor and extent of the riparian plant community increases.

The Proposed Action would likely not contribute to the cumulative expansion of invasive non-

native plants within Fields Basin Allotment or Pueblo Mountains because acceleration of growth and expansion of riparian vegetation within Pass Creek Riparian Pasture is expected to result in reduction of the weed population already present. When this effect is considered in combination with post-fire rehabilitation seeding and programmatic weed control efforts occurring within the allotment and elsewhere in Pueblo Mountains, the cumulative effect is expected to be a reduction in weed populations (especially thistles) within the allotment.

Migratory Birds

Some disturbance (interruption of feeding and nesting behavior) to ground-nesting and shrub-nesting birds could occur in the immediate vicinity of fence-building operations in the two-month time period during which construction would be authorized. Generally, 2 miles of fence can be constructed in 1 to 2 weeks, effectively limiting actual duration of disturbance. After initial disturbance of fence-building, the fence would provide additional singing and resting perches for migratory songbirds, but may also provide additional vantage points for nest predators and nest parasites such as brown-headed cowbirds.

Accelerated growth of riparian vegetation would result from reduced livestock numbers in the riparian area, and would provide additional habitat sooner for riparian shrub-nesting species such as yellow warbler, warbling vireo, lazuli bunting, and willow flycatcher, effectively expanding the bird species diversity within the riparian pasture. Some suitable shrub habitat could be available as soon as 6 years, but a decade or more may be required to establish the potential riparian landbird community (See effects common to all action alternatives).

The Proposed Action would contribute to slight but measurable cumulative effects to migratory and resident bird habitat within Fields Basin Allotment and Pueblo Mountains because: 1) the change in number of livestock during the authorized season of use in Pass Creek Riparian Pasture would be expected to enhance landbird species diversity over years to decades (the pace of development of riparian shrub vegetation); and 2) when effects of this project are evaluated together with future riparian enhancement projects within Fields Basin Allotment or Pueblo Mountains, cumulative effect would be to expand and enhance distribution of (especially shrub-dependent) riparian landbird species and improve connectivity between habitat patches.

Water Quality

Close monitoring of preference change to willows in the late summer/fall grazing period and subsequent livestock removal is expected to maintain accelerated recruitment and growth of riparian vegetation. It is also expected to provide additional shade (which would reduce stream temperatures) and bank stability (which would decrease the potential for excessive erosion and sediment input) to the stream within six to ten growing seasons. The pace of water quality improvements can only be based on speculation, but could approach site potential within a decade or slightly longer as riparian vegetation develops.

Special Status Species – Fauna (Greater Sage-Grouse)

Since there are no leks within or near the proposed fence line, no increased collision hazards to flying birds or predation from raptors is likely to occur (BLM National Sage-Grouse Habitat Conservation Strategy, 2004, p. 20)

Special Status Species – Flora (Raven's lomatium)

Neither species of lomatium would be affected during the construction process because construction would be done after plants are dormant. Some plants along the fence line could be affected by livestock trailing after construction; however, this would be difficult to predict until actual animal movement patterns are observed.

Grazing Management

There would be no change to the number of animals and season of use as authorized for the allotment under the current term grazing permit. With a fence in place, permittees would be able to manage late summer and fall livestock in O'Keefe Seeding and Pass Creek Pastures without the need for riders and dogs to move cattle out of the riparian area on a daily basis. If or when utilization targets have been achieved in the late summer and fall grazing season in Pass Creek Pasture, cattle removed from Pass Creek Pasture would remain in O'Keefe Seeding for the balance of the authorized season.

There would be no effect to authorized use within the allotment, since forage in the remainder of O'Keefe Seeding Pasture is adequate to absorb the AUMs removed from Pass Creek Pasture under the Proposed Action. Since livestock would no longer be able to congregate along Pass Creek, utilization of uplands in the reconfigured O'Keefe Seeding Pasture would increase from slight to light to moderate. Since cattle would not be permitted to remain in the riparian area and consume vegetation there, utilization of upland (crested wheatgrass) forage west of Pass Creek would increase. Cattle would be unable to utilize upland vegetation east of Pass Creek for the balance of the authorized season regardless of available upland forage.

The Proposed Action would not contribute to any cumulative effects to grazing management because no changes in the number or kind of livestock would occur within Fields Basin Allotment or the AMU.

Soils

Since livestock numbers and duration of use would be reduced in the riparian pasture (including adjacent uplands), effects to soil compaction and bank trampling in riparian areas from hoof impact would also be reduced. Soils could be compacted in localized areas from mechanized equipment used to carry fence material to the site. However, rubber-tired vehicles would ease the amount of compaction disturbance, and this would not be expected to affect plant productivity or recruitment by the following one to two growing seasons. There is potential for livestock to create a trail along the fence after construction, which could lead to compaction and erosion in localized areas. Since the proposed fence line has little or no direct hydrologic connectivity (via

rills or gullies) to Pass Creek, any erosion that occurs would not be expected to contribute to a failure to attain riparian rangeland health standards in Pass Creek Riparian Pasture.

Upland Vegetation

Livestock grazing of upland vegetation in Pass Creek Riparian Pasture and O'Keefe Seeding Pasture would resume (in 2010) after the fire-recovery period. Although livestock may continue to graze in Pass Creek Riparian Pasture in the late summer/fall period in a pattern similar to the way it was grazed before the fire, lighter stocking and less time in the area would reduce the amount of material removed after seed-set. Basic plant communities and plant community seral stages are unlikely to change.

Some vegetation would be crushed in an area no more than 15-feet wide along the entire length of fence as a result of vehicle traffic during survey and construction of the project. Because blading of the fence line would not be allowed, the disturbed area would naturally revegetate in two or three growing seasons. Occasional (usually once per year) use of the two-track trail for fence maintenance would leave evidence of passage, but would not eliminate vegetation from the trail.

The Proposed Action would not contribute to cumulative effects to vegetation as a resource because effects would be limited to the project area and would not result in any measurable change in arrangement or distribution of vegetation communities within the allotment or Alvord Basin.

Visual Resources

The proposed fence would introduce a human-made linear feature into the landscape. Though some fence would be visible from Harney County Road 202, it would not dominate the view as seen from the road by the casual observer; therefore, Class III VRM objectives would continue to be met.

Wildlife/Locally Important Species and Habitat

Constructing new fence within the project area could affect movement of deer and pronghorn. However, all fence construction would comply with the BLM's Project Design Features, which are intended to accommodate passage of animals. Deep snow that would impede passage of pronghorn under the lowest wire (Montana BLM Riparian Technical Bulletin #4, 1998) is rare at this elevation in Alvord Basin. Therefore, no measurable impacts to wildlife movements would be expected. Forage and cover opportunities within the riparian area for deer and pronghorn would increase in a shorter period of time as development of riparian vegetation is accelerated.

Fires have shaped vegetative communities within the project area, and wildlife species have and will continue to respond to these changes. Any individual effects resulting from the new fence and establishment of the new riparian pasture to distribution, movement, migration of terrestrial wildlife species would not be distinguishable from effects of the recent wildfire or rehabilitation efforts under way within the burned area. Therefore, no cumulative effects to wildlife from the new fence are expected.

Social and Economic Values

An investment of public funds of approximately $10,000 would be required to build the fence, providing economic opportunities for local fence contractors and suppliers. The permittees may incur some small costs for annual fence maintenance. Collection of grazing permit fees would not differ from the No Action alternative. The area's intrinsic value as part of a larger recreational use area would be maintained.

COMMENTS RECEIVED

The Burns BLM received comments from an Interested Public dated February 22, 2006. A summary of the comments along with responses are as follows.

Comment #1. The BLM did not provide a range of alternatives.

Response: In the original EA the BLM analyzed the proposed action and the no action alternative. The Burns BLM has now provided four alternatives: 1) No Action, 2) Proposed Action, 3) Herding Alternative, and 4) Grazing Removal Alternative. Please see Chapter II: Alternatives Including the Proposed Action.

Comment #2. The regulations require the Burns BLM to makes changes in the grazing system once the determination is made rangeland health standards are not being met and livestock are a causal factor.

Response: The BLM has made changes. See the Proposed Action section of the EA. Livestock grazing would occur in the spring/early summer every year until the proposed fence is constructed. See a description of the grazing system in the Proposed Action section of the EA.

Comment #3. The EA lacks any detailed discussion of the potential impacts to sage-steppe habitat of the proposed action for sage grouse, sagebrush obligates, and pygmy rabbits.

Response: A discussion of sage-grouse and pygmy rabbits and their habitats are discussed in Chapter III: Affected Environment.

Comment #4. The BLM failed to prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values. The BLM refused to re-analyze the suitability of non-recommended WSA's.

Response: The general project area was evaluated for presence of wilderness characteristics as part of Babes Canyon Unit in the AMU/CMPA PRMP/FEIS, August 2004 (Sections 3.23, p. 3-72 and 4.23, p. 4-249 to 4-256). An IDT completed the evaluation of the unit based on information from past wilderness characteristic inventories, current resource conditions and materials submitted by Oregon Natural Desert Association (ONDA). The IDT found Babes Canyon Unit did not contain wilderness characteristics. A following submission by ONDA also noted the specific area in which the riparian pasture would be established was excluded from ONDA's proposal for new wilderness. This finding was incorporated into the AMU Record of Decision (ROD)/RMP (August 2005) and, therefore, will not be analyzed further.

Comment #5. The EA is short on cumulative impacts analysis.

Response: Due to the comments and concerns from the interested public the BLM has reanalyzed the cumulative impact section of the EA, and the BLM believes the level of cumulative effects analysis is commensurate with potential effects of the proposed action.

PROPOSED DECISION RECORD

A copy of the original EA was mailed to permittees and interested publics. In addition, a notice was posted in the Burns-Times Herald newspaper.

The authorized grazing use in the O'Keefe Pasture, which included Pass Creek, was from

Pasture	Year 1	Year 2
O'Keefe	04/01 – 06/15	08/15 – 10/30

Having considered a range of alternatives and associated impacts and based on analysis in the Pass Creek Riparian Pasture EA OR-05-026-072, it is my decision to implement the proposed action which should allow the rangeland health standards and Fields Basin Allotment objectives to be met.

The proposed action is to construct approximately two miles of three-strand barbed wire fence along the southwest side of Pass Creek, connecting existing fence lines. The fence would create an approximately 1,100-acre pasture called Pass Creek Riparian Pasture. Pass Creek would provide the only water available for livestock use within the new pasture. The remaining 3,353 acres would continue to be identified as O'Keefe Seeding Pasture with four troughs on an existing pipeline as a water source for livestock. The riparian pasture would provide for closer management and control of cattle presence and forage consumption without the need for constant presence by range riders during the late summer/early fall authorized grazing season.

Livestock grazing would resume after the fire-recovery period in O'Keefe Seeding and Pass Creek Riparian Pastures. Approximately 50 head of cattle from one permit (125 AUMs) would be authorized to use Pass Creek Riparian Pasture during the spring season (April 1 – June 15) of alternate years. A total of 50 head of cattle from both permits would be permitted to graze Pass Creek Pasture in the late summer/fall season (50 AUMs) during alternate years. Spring and fall grazing would not occur during the same year. Table 1 - Grazing Rotation Schedule - Proposed Action, outlines the proposed grazing schedule for the pasture (assuming a longer period would not be necessary for post-fire recovery). No change to permitted use within Fields Basin Allotment would occur, and the pattern of use would be the same as before the 2006 wildfire. Only the number of livestock and extent of the fall-use period along Pass Creek is proposed for change.

Table 1 - Grazing Rotation Schedule - Proposed Action

Year	2007	2008	2009	2010	2011	2012	2013
Spring Use Season/AUMs	rest	rest	April 1 – June 15 125	rest	April 1 – June 15 125	rest	April 1 – June 15 125
Late Summer/ Fall Use Season/AUMs	rest	rest	rest	August 1 – Sept. 1 50	rest	August 1 – Sept. 1 50	rest

Project Design Features:

1. The fence would be constructed to BLM specifications for a 3-strand barbed wire fence, including 22-foot line post spacing. Wire spacing would be 18 inches, 30 inches, and 42 inches up from the ground with a smooth bottom wire. The livestock permittees would be responsible for fence maintenance defined in a cooperative agreement.
2. No blading, grading, or scalping of the fence line would be allowed.
3. Prior to final inspection all construction trash and excess debris would be removed from public lands and disposed of at a site approved by the BLM Contracting Officer.
4. Fence construction activities would occur after the ground is dry and before weeds have set seed. Seed set generally occurs from approximately June 1 through July 1.
5. Vehicles and equipment would be cleaned prior to entry to the site for fence work.
6. A two-track trail adjacent to the fence would remain available for maintenance access.

Monitoring:

Monitoring for short-term progress toward objectives would occur at the close of each grazing year. The utilization target for key sedge species is an average four inches of residual stubble height at the end of each growing season (using the stubble height method for measuring residue,

BLM 1999). If monitoring indicates key species utilization targets have been reached or exceeded before the authorized one-month fall season has ended, livestock would be removed from Pass Creek Pasture for the remainder of the use season. As key willow species expand within the pasture, these would be monitored for preference change (the point in time at which livestock choose willows over other forage species available). Utilization targets would be established as appropriate, and may be qualitative (photo points) rather than quantitative in order to best account for variation in species needs and growing season conditions (AMU/CMPA RMP, Appendix H, page 4).

Monitoring for long-term riparian conditions would occur at least three times between 2007 and 2012 (six years after the last wildfire). This could consist of photo points, greenline, or other methods determined to be appropriate for the site and available resources. If after six growing seasons monitoring indicates grazing with reduced numbers of livestock during the August 1 - September 1 season is not achieving riparian vegetation objectives as described in the Purpose and Need, livestock grazing would be further reduced in Pass Creek Pasture. This may include restriction of use to one out of three years, one out of four years with associated monitoring, or complete elimination of late-season grazing in Pass Creek Pasture. Any decision to be reached following additional monitoring would be documented in a revised Proposed Grazing Decision with associated rationale.

Rationale:

I have selected the proposed action for the reason it best meets the decision factors among all alternatives.

Decision Factors

1. The Proposed Action achieves RMP management direction for Social and Economic, Vegetation, Grazing Management and Fish and Wildlife objectives (cited earlier) in a balanced manner without placing greater importance on one over the other three.
2. The Proposed Action is likely to achieve Standards for Rangeland Health and Guidelines for Livestock Management for Oregon and Washington in accordance with 43 CFR 4180.2(b).
3. The Proposed Action does not have unreasonable management cost to the public in achieving the project goals and objectives. The $10,000 one time cost is well within the range of funds available to BLM for range improvements on public lands.
4. The Proposed Action does not have unreasonable management cost to the livestock grazing permit holder.
5. The Proposed Action achieves project objectives in a reasonable time frame.
6. The Proposed Action employs adaptive management strategies in order to assure success in achieving project objectives.

I did not select the No Action Alternative or the other action alternatives for reasons described in the table below.

Decision Factor	No Action	Proposed Action	Herding	Removal of Livestock
1.*RMP Direction*	Does not achieve RMP management objectives for resource enhancement.	Balances RMP management direction by providing for sustainable livestock grazing on public land without preventing achievement of other RMP objectives.	Does not balance RMP management direction as well as Proposed Action. Semi-annual costs to operator are unpredictable, may be unsustainable, and may inhibit achievement of RMP direction for Social and Economic Values.	Does not balance RMP management direction. RMP direction for Social and Economic Values and Grazing Management is not achieved.
2.*Effective Implementation*	Does not achieve project objectives for resource enhancement.	Adaptive management and monitoring ensures actual conditions will direct any necessary change in management to achieve project objectives.	Adaptive management and monitoring ensures actual conditions will direct any necessary change in management to achieve project objectives.	Phased removal of livestock grazing would achieve project objectives for resource enhancement but not for resource use.
3.*Cost to the public*	No cost to the public, but does not achieve project objectives for resource enhancement.	Requires an initial investment of $10,000 (contract awarded to a local business), after which maintenance costs become the responsibility of the permittees. Continues to provide annual grazing fees to the public at approximately the current rate.	Requires no initial investment of public funds. May reduce annual grazing fees to the public if necessary to achieve project objectives.	Requires no initial investment of public funds. Eliminates annual grazing fees to the public after five years.

Decision Factor	No Action	Proposed Action	Herding	Removal of Livestock
4. *Cost to management of livestock*	Does not achieve project objectives for resource enhancement.	Requires maintenance costs to permittees of approximately $250/year	Cost to permittees would be at least $100/day per rider. Number of required riders is unknown. Cost could range from at least $7,500 (1 rider) to $15,000 (2 riders) every other year during late summer/fall grazing season.	Bi-annual cost to the permittees for replacement forage would range from $12-$16 per AUM, or $11,400 to 15,200 for the entire one-month late summer/fall grazing season (based on 950 AUMs lost).
5.*Time frame*	Does not achieve project objectives for resource enhancement.	The IDT expects PFC or significant progress toward PFC can be attained at the end of 6 growing seasons.	The IDT expects PFC or significant progress toward PFC can be attained at the end of 6 growing seasons.	The IDT expects PFC or significant progress toward PFC can be attained at the end of 6 growing seasons. Resource use objectives would not be met.
6.*Adaptive management*	Does not include adaptive management. Does not achieve project objectives.	Adaptive management is an integral part of the proposal.	Adaptive management is an integral part of the proposal.	Adaptive management is not a key part of the proposal.

Any applicant, permittee, lessee or other interested public may protest a proposed decision under Section 43 CFR 4160.1 and 4160.2, in person or in writing to Karla Bird, Field Manager, Andrews Resource Area, Burns District Office, 28910 Hwy 20 West, Hines, Oregon 97738, within 15 days after receipt of such decision. The protest, if filed should clearly and concisely state the reason(s) as to why the proposed decision is in error.

In the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision. Any protest received will be carefully considered and then a final decision will be issued.

Any applicant or other person whose interest is adversely affected by the final decision may file an appeal in accordance with 43 CFR 4.470 and 43 CFR 4160.3(a) and 4160.4. The appeal may be accompanied by a petition for a stay of the decision in accordance with 43 CFR 4.21, pending final determination on appeal. The appeal and petition for a stay must be filed in the office of the authorized officer, as noted above, within 30 days following receipt of the final decision, or within 30 day after the date the proposed decision becomes final.

This appeal shall state the reasons, clearly and concisely, why the appellant thinks the final decision is in error and otherwise comply with the provisions of 43 CFR 4.470 which is available at the BLM office.

Should you wish to file a petition for a stay, you must file within the appeal period. In accordance with 43 CFR 4.21(b)(1), a petition for a stay must show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied.
2. The likelihood of the appellant's success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether or not the public interest favors granting the stay.

As noted above, the petition for stay must be filed in the office of the authorized officer.

/signature on file/ April 18, 2007

Karla Bird Date

Andrews Resource Area Field Manager